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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

MAXIMILIAN KLEIN, et al., on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC., a Delaware  
Corporation,

Defendant.

Case No. 3:20-cv-08570-JD

**[PROPOSED] ORDER GRANTING  
META PLATFORMS, INC.'S MOTION  
TO EXCLUDE TESTIMONY OF KEVIN  
KREITZMAN AND MICHAEL A.  
WILLIAMS**

Hearing Date: December 14, 2023  
Time: 10:00 a.m.  
Judge: Hon. James Donato

**[PROPOSED] ORDER**

IT IS HEREBY ORDERED: Defendant Meta Platforms, Inc.'s Motion to Exclude Testimony of Kevin Kreitzman and Michael A. Williams is GRANTED as follows:

1. ORDERED, that the testimony and reports of Kevin Kreitzman are excluded pursuant to Federal Rule of Evidence 702 in their entirety; and it is further

2. ORDERED, that the testimony as described in ¶¶ 13-15, Section II.E.i (¶¶ 134-143), Section III.A.i (¶ 221), Section IV (¶¶ 323-354), Section V (¶¶ 355-357), and ¶¶ 362-364 of Michael A Williams's Expert Report is excluded pursuant to Federal Rule of Evidence 702; and it is further

3. ORDERED, that the testimony as described in ¶¶ 10-12, ¶¶ 19-32, Section III (¶¶ 61-133), and Section IV (¶¶ 134-179) of Michael A. Williams's Reply Report is excluded pursuant to Federal Rule of Evidence 702.

**IT IS SO ORDERED**

Dated: \_\_\_\_\_, 2023

\_\_\_\_\_  
The Honorable James Donato  
United States District Court Judge